

EXHIBIT 1

3/10/2023

Mr. Lamont Pugh RG 9048
SCI - GREENE
169 PROGRESS DRIVE
Waynesburg PA 15370

JEREMY S. BREON:
CENTRE COUNTY PROTHONOTARY
CENTRE COUNTY COURTHOUSE
102 SOUTH ALLEGHENY ST. RM 102
BELLEFONTE PA 16823

FILED
2023 MAR 15 PM 3:02
JEREMY S. BREON
PROTHONOTARY
CENTRE COUNTY, PA

IN RE: LAMONT PUGH: Plaintiff VS. ROBERT MARSH AND LIEUTENANT
STAVOLA: Defendants. Docket No. 2019-2409

NOTICE

GREETINGS and Good day to you! This is IN REFERENCE
TO YOUR PROFESSIONAL ASSISTANCE, THAT I AM IN QUEST
OF I WOULD APPRECIATE IF YOU CAN OBLIGE ME WITH
A COPY OF PETITION FOR REVIEW WITH PRECISE FOR
WRIT OF SUMMONS SENT TO COURT ADMIN 7/8/2019 AND
CERTIFICATE OF COMPLIANCE FOR PETITION FOR REVIEW
FILED 7/5/2019 AND THE ADDRESS: TO SHERIFF'S
OFFICE OF BELLEFONTE PA 16823

THANK YOU FOR YOUR PREVIOUS TIME AND PATIENCE
A PROMPT REPLY BE APPRECIATE

Respectfully A/L. Lamont Pugh RG 9048

A/L. Lamont Pugh
PRO SE Plaintiff

Supreme Court of Pennsylvania
Court of Common Pleas
Civil Cover Sheet



County

2019-2409

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law.

Commencement of Action:

- ☐ Complaint ☐ Writ of Summons
☐ Transfer from Another Jurisdiction

- ☒ Petition
☐ Declaration of Taking

2019 JUL -5 P 2:23

Lead Plaintiff's Name:

MR. LAMONT PUGH

Lead Defendant's Name:

Are money damages requested? ☒ Yes ☐ NoDollar Amount Requested:
(check one)

- ☒ within arbitration limits
☐ outside arbitration limits

Is this a Class Action Suit? ☐ Yes ☒ NoIs this an MDJ Appeal? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney:

☒ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

- ☐ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☐ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☐ Other:

CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other

- ☐ Employment Dispute:
Discrimination
☐ Employment Dispute: Other

☐ Other:**CIVIL APPEALS**

- Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other

☐ Zoning Board☒ Other:

DEPT. OF CORRECTIONS
Petition For Review

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other:

REAL PROPERTY

- ☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other:

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations
Restraining Order
☐ Quo Warranto
☐ Replevin
☐ Other:

PROFESSIONAL LIABILITY

- ☐ Dental
☐ Legal
☐ Medical
☐ Other Professional:

IN THE COMMON PLEAS COURT OF CENTRE COUNTY
OF PENNSYLVANIA

MR. LAMONT PUGH: PETITIONER

FILED FOR RECORD

2019 JUL -5 P 2:23

DEBRA C. IMMEL
NOTARY
PUBLIC, PA.

VS.

No. 2019-2909

Robert Marsh: SUPERINTENDENT, et al.
~~DEFENDANT~~

Demand a jury Trial

STAVOLA: LIEUTENANT, DEFENDANT

PETITION FOR REVIEW

I MR. LAMONT PUGH; PETITIONER present this Petition For Review Pursuant To 42 Pa.C.S. § 933(A)(2) and 42 Pa.C.S. § 931... AN 42 Pa.C.S. § 2713 Neglect of A CARE dependent PERSON / § 241 and § 242 Deprivation and Conspiracy against A PERSON rights. THE HONORABLE COURTS have vast jurisdiction and Power to Hear and Rule on all matters in their jurisdiction. DELIBERATE INDIFFERENT and GROSS Negligent was Deployed AN D.O.C Code of Ethics Violated.

PARTIES

- 1) MR. LAMONT PUGH; PETITIONER is housed in the Special Management Unit (SMU) at SCI - Fayette Restricted Housing Unit (RHU) located at: 48 OVERLOOK DRIVE, LABELLE PA 15450
- 2) ROBERT MARSH; DEFENDANT is employed as the Superintendent of SCI - BENNER Township his capacity as supt. is responsible for the care, custody, control also responsible for administering SCI BENNER Township in compliance with and in obedience to the constitutions and law of PENNSYLVANIA and OF THE UNITED STATES as well as all administrative directives and Policy Statement promulgated. SCI-BENNER township is located at: 301 Institution DRIV

- 3.) STAVOLA Defendant is employed as Lieutenant at SCI BENNER Township located at: 301 INSTITUTION DRIVE BELLEFONTE PA 16823

COUNT 1. Neglect of A Care Dependent person

- 4.) ON 1/18/2019 I was being transferred from SCI Dallas back to SCI Fayette. When we stop at SCI BENNER Township, I was placed in 135 holding cell Transportation Hub. @ 10:00 AM Plaintiff notified (LT. STAVOLA Defendant) Plaintiff was having chest pain, an Plaintiff need to see medical
- 5.) Plaintiff was deprived medical treatment by Defendant LT. STAVOLA left to suffer in pain and discomfort.
- 6.) When Plaintiff arrived at SCI Fayette he immediately told MS. CHRISTINA TANNER: NURSE who did (2 EKG tests). Plaintiff was kept in SCI-Fayette infirmary to be treated and monitor do to EKG results.

COUNT 2. Deprivation and Conspiracy against A Person Rights / AN DOC Code of Ethics (paragraph 4.5)

- 7.) Defendant LT. STAVOLA maliciously, intentionally, AN deliberately neglected to notify medical and his supervisor which is protocol of the DOC Code of Ethics

COUNT 3. DELIBERATE INDIFFERENCE (paragraph 4.5.7)

- 8.) Defendant LT. STAVOLA paragraph 4.5.7 displayed.

COUNT 4. Exhaust All Available Administrative Remedy

Plaintiff have exhausted all available Administrative Remedy afforded.

COUNT 5. Relief Sought

Wherefore:

Plaintiff requests that this honorable court:

- A.) Award punitive damage to Plaintiff against defendant both jointly and separately in the amount of \$50,000.00
- B.) Award compensatory damage to Plaintiff against defendant both jointly and separately in the amount of \$50,000.00
- C.) Award Declaratory relief that Plaintiff constitutional rights were violated by Defendants
- D.) Award such other and further relief as this court may deem appropriate in what honorable judge seem fit.

Date 7.1.2019

I just got it back
AN now sending it
to the court with IFP.

1st Mr. Lammert Pugh
Pro SE Plaintiff